

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit E

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,
Plaintiffs,
vs. CASE NO. 3:21-cv-03302-MBS
TJH-RMG
THOMAS C. ALEXANDER, et al.,
Defendant.

VTC
DEPOSITION OF: WALLACE HERBERT JORDAN, JR.
VOLUME II - Pages 225 through 444
(Appearing by VTC)
DATE: July 21, 2022
TIME: 10:03 a.m.
LOCATION: Nexsen Pruet Law Firm
1230 Main Street, 7th Floor
TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Susan M. Valsecchi, CRR
Registered Professional Reporter
(Appearing by VTC)

1 screen, too, if you want.

2 MR. MATHIAS: No, don't worry about
3 that.

4 If you will turn to Tab 38. And it was
5 marked as an exhibit?

6 MR. CUSICK: Yeah, Plaintiff's Exhibit
7 7.

8 BY MR. MATHIAS:

9 Q. Plaintiff's Exhibit 7, do you recognize
10 this document?

11 A. Yes, you're referring to the guidelines
12 and criteria.

13 Q. Yes, and what does it say in the upper
14 right-hand corner?

15 A. Adopted 8/3/21.

16 Q. Does that mean that the full House
17 passed this?

18 A. No, this would have been adopted by
19 only the Ad Hoc Committee.

20 Q. And so this is not South Carolina law,
21 is it?

22 A. No.

23 Q. During the process of redistricting,
24 did you -- or those with whom -- to whom you tasked
25 the authority -- do everything in your ability to

1 make sure that the new districts, congressional
2 districts, complied with the United States
3 Constitution?

4 A. Ask that one more time.

5 Q. Did you, or someone to whom you tasked
6 with the analysis, do what you could to make sure
7 the newly enacted congressional districts complied
8 with the United States Constitution?

9 A. Yes, that would have been -- you know,
10 obviously it was something I wanted to see happen
11 because I voted for and approved this criteria and
12 that's number one, and as the other things are
13 organized in here.

14 But anything I couldn't specifically
15 consider myself practically capable of doing, then
16 I would have relied upon members of the staff or
17 counsel to make sure those things are completed.

18 Q. Is that also true with respect to
19 federal law, you tried to follow the law?

20 A. Yes.

21 Q. And you tried to follow state law?

22 A. Yes.

23 Q. And you tried to make sure the
24 population of the districts complied with the law?

25 A. Yes.